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8

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES,
12 Plaintiff,
13 v.
14 URIEL LIRA-CABRERA,
15 Defendant.
16

Case No. 2:20-cr-0061-APG-VCF

**STIPULATION TO ORDER
PROBATION TO PREPARE A
REPORT DETAILING THE
DEFENDANT'S CRIMINAL
HISTORY**

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
19 Trutanich, United States Attorney, and Jared Grimmer, Assistant United States
20 Attorney, counsel for the United States of America, and Rene L. Valladares,
21 Federal Public Defender, and Raquel Lazo, Assistant Federal Public Defender,
22 counsel for Uriel Lira-Cabrera, that this Court order U.S. Probation to prepare a
23 report detailing the defendant's criminal history, if any.

24 This Stipulation is entered for the following reasons:
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1 1. This is an illegal reentry fast track case under USSG § 5K3.1. The
2 parties have submitted a fast track plea agreement to the court. A plea hearing is
3 currently scheduled for April 22, 2020.¹

4 2. Under the fast track agreement, the parties have agreed to jointly
5 request that the change of plea and sentencing proceed on the same day. The
6 defendant has further agreed to consent to a presentence investigation interview
7 prior to entry of plea. For probation to commence the interview and the presentence
8 investigation report, they require an order from the Court instructing them to
9 prepare a report detailing the defendant's criminal history. Typically, this order is
10 entered at the time of a defendant's initial appearance by way of a minute order.
11 However, in this case, the magistrate judge did not issue such an order.²

12 3. In order to give full effect to the fast-track agreement, the parties
13 require the requested order. Probation cannot begin the presentence investigation
14 report without the order.
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16 4. Defense counsel has spoken to probation and they have no opposition.
17 Probation requests this order.
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24 ¹ Given the COVID-19 pandemic, the parties are filing a stipulation to
25 continue the hearing.

26 ² The parties surmise that this likely did not happen in this case because
the case was initiated by way of a complaint rather than an indictment.

1 DATED this 6th day of April 2020.

2
3 RENE L. VALLADARES
4 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

5 */s/ Raquel Lazo*
6 By _____
7 RAQUEL LAZO
Assistant Federal Public Defender

/s/ Jared Grimmer
By _____
JARED GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,
5

6 Plaintiff,
7

8 v.
9

10 URIEL LIRA-CABRERA,
11

12 Defendant.
13

Case No. 2:20-cr-0061-APG-VCF

ORDER

14 Based on the Stipulation of counsel and good cause appearing,
15

16 IT IS ORDERED that the U.S. Probation is directed to prepare a report
17 detailing the defendant's criminal history, if any.
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19 Defendant's counsel shall provide a copy of this Order to the Probation
20 Office.
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22 UNITED STATES DISTRICT JUDGE
23

24 Dated: April 7, 2020.
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